

THE C-SPAN NETWORKS

400 North Capitol Street, NW
Suite 650
Washington, D.C. 20001

September 1, 2005

Marlene H. Dortsch,
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Comments of The C-SPAN Networks¹ (C-SPAN, C-SPAN2 & C-SPAN3) on the Proposal to Prohibit Analog Satellite Video Transmissions

IB Docket No. 00-248

Dear Secretary Dortsch:

In its *Third Further Notice of Proposed Rulemaking* in the above-referenced Docket, the Commission proposes to "prohibit analog video transmissions"² by satellite, and to do so with "a transition period of no more than one year."³ The *Notice* also asks users for information about the effects of such a proposal on their operations.

C-SPAN and C-SPAN2 are currently delivered to their cable television system distributors by analog satellite transmission. C-SPAN is delivered to 63.8 million cable households over approximately 6,900 cable systems; C-SPAN2 is delivered to 56.1 million cable households over approximately 3,600 cable systems. C-SPAN3 is a digital service that is delivered to cable systems primarily by means of digital transmissions.

¹ The C-SPAN Networks are full time satellite delivered public affairs television programming services available primarily via cable television, and devoted entirely to information and public affairs, including the live gavel-to-gavel coverage of the proceedings of the U.S. House of Representatives (on C-SPAN), the U.S. Senate (on C-SPAN2) and a variety of other events at public fora around the country and the world. The C-SPAN Networks also include C-SPAN3, a fulltime digital programming service launched in January of 2001. The C-SPAN Networks are produced and distributed by the National Cable Satellite Corporation ("NCSC"), a non-profit educational corporation in the District of Columbia. NCSC is exempt from federal income tax pursuant to I.R.C. Sec. 501(c)(3).

² *Notice*, at Para. 87.

³ *Notice*, at Para. 88.

An abrupt prohibition of analog satellite video transmissions within 1 year would cause a significant disruption and cost to the operations of the C-SPAN Networks, and particularly to the operations of our most widely distributed network -- C-SPAN. We are, of course, aware of the general move throughout the television industry away from analog and toward digital. Indeed, we have invested heavily in digital equipment in many of our operations and fully expect that in time all of our operations will be digital, including the satellite transmissions of our networks.

However, our planning did not anticipate that digital transmission of our networks to the satellite might be either so abrupt or even compelled. We have budgeted for the digital transmission of C-SPAN2 to the satellite within the next few years, and we would incur some disruption and cost were we required to advance that schedule as the *Notice* proposes.

But our much greater concern is that we had planned and budgeted to continue uplinking C-SPAN in analog form for at least several more years. Our expectation was (and is) that at some unknown point in the not-too-distant future (which is to say, within a decade) C-SPAN would complete its transition from analog to digital, including its uplinking and downlinking operations and that the significant costs of that transition would be spread across that time period. An unanticipated (and therefore unbudgeted) requirement that such an expenditure be made within 1 year would place a significant short-term stress on the resources we have available to fulfill our public service mission.

The C-SPAN Networks urges the Commission to adopt a more reasonable schedule for the proposed transition to fully digital video satellite transmissions. A 1-year transition is unreasonably short and does not consider disrupting effects on the C-SPAN Networks and other programmers.

Cordially,

THE C-SPAN NETWORKS

By:

Bruce D. Collins, Esq.
Corporate VP & General Counsel

Comments of The C-SPAN Networks
IB Docket No. 00-248
Page 3

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